June 4, 2002

Ms. Linda Pardy,
Environmental Scientist
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Dear Ms. Linda Pardy:

The following letter is submitted as a public comment to the Public Review Draft of the Total Maximum Daily Load for Diazinon in Chollas Creek Watershed (TMDL). The San Diego BayKeeper believes that addressing the following items will strengthen the TMDL and help to ensure that the proposed goals are met. Comments on various technical issues are listed below:

1) Given that the goal of the TMDL is to attain Basin Plan narrative water quality objectives for "Toxicity" and "Pesticides" and restore WARM and WILD beneficial uses, it is important that a survey of aquatic organisms (including benthic communities) be conducted in Chollas Creek. Such a survey should include the characterization and mapping of viable aquatic life habitat within Chollas Creek. As indicated in the report, to this date such a survey has neither been found or done. Its important to know what it is we are trying to protect and that baseline data be available for evaluation of trends.

2) In addition, given that Diazinon's affinity to sediment, the effects of the pesticide on benthic communities should also be discussed and evaluated. The discussion should include a list of scientific literature and technical documents describing known benthic community impacts in both marine and freshwater habitats. In addition, a benthic community monitoring component should be included as a tool to evaluate TMDL effectiveness (following a triad approach).

3) The section on environmental degradation products of Diazinon should go into more detail. Within this section a list of environmental degradation products of Diazinon should be included, along with their chemical formulas. Also, a discussion of the what is known about the toxicity of the degradation products relative to Diazinon should be included, addressing tetraehtyl dithio- and thiopyrophosphates in particular. These compounds are known to be degradation products in the absence of sufficient water and are extremely toxic.

4) A discussion of possible synergistic effects of Diazinon with other known contaminants in Chollas Creek should be included. In particular, the effectiveness of the proposed WQC in protecting aquatic life should be evaluated in light of known toxicant interactions. As in other sections of the TMDL statements should be backed by technical or scientific literature and the absence of valuable information should be noted and addressed.

Thank you for your time and kind attention. Should you have any questions please feel free to contact me at hsarabia@sdbaykeeper.org or at the number provided below.

Sincerely,

Hiram Sarabia,
Staff Scientist
San Diego BayKeeper